

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

MEI PANG, Individually and on Behalf of All Others Similarly Situated,	§	
Plaintiff,	§	CASE NO. 1:22-CV-1191-LY
v.	§	CLASS ACTION
MICHAEL LEVITT, MICHAEL TRZUPEK, and DENISE STERLING,	§	
Defendants.	§	

JOINT STIPULATION PROPOSING SCHEDULE FOR PLEADINGS

Lead Plaintiff Morgan Hoffman (“Plaintiff”) and Defendants Michael Levitt, Michael Trzupek, and Denise Sterling (collectively, “Defendants,” and together with Plaintiff, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, the Court entered an Order dated December 15, 2022 which, among other things, instructed that “[w]ithin 14 days after the Court's appointment of a lead plaintiff pursuant to the PSLRA, the Court-appointed lead plaintiff and Defendants shall confer regarding, and submit to the Court for approval, a proposed schedule for the filing or designation of an operative complaint and for Defendants’ responses thereto” (Dkt. No. 13);

WHEREAS, the Court entered an Order on March 7, 2023, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), appointing Morgan Hoffman as Lead Plaintiff and The Rosen Law Firm, P.A. as Lead Counsel (Dkt. No. 44);

WHEREAS, Lead Counsel has conferred with counsel for Defendants regarding a schedule for the filing of an amended complaint and for Defendants’ response(s) thereto;

IT IS HEREBY STIPULATED AND AGREED, by and among the Parties, subject to the Court's approval, as follows:

1. Plaintiff shall file an amended complaint on or by May 5, 2023;
2. Defendants shall answer, move to dismiss, or otherwise respond to Plaintiff's amended complaint on or by 45 days from the filing of the amended complaint;
3. If Defendants move to dismiss the amended complaint, Plaintiffs shall file their opposition to any such motion on or by 45 days from the filing of the motion, and Defendants shall file their reply in support of their motion on or by 30 days from the filing of the opposition to the motion.

Dated: March 21, 2023

COCHRAN LAW, PLLC

/s/Stuart L. Cochran

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Dated: March 21, 2023

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Additional Counsel for Lead Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/Stuart L. Cochran
Stuart L. Cochran